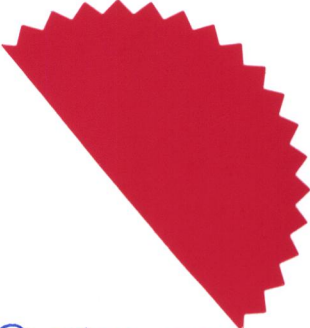


KOH

TFH/JC: USAO 2022R00108

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND


USDC- GREENBELT
'22 FEB 24 PM3:17

UNITED STATES OF AMERICA

v.

JEFFREY DARNELL ALDERSON,

Defendant

CRIMINAL NO. PX 22 CR65

(Receipt of Child Pornography,
18 U.S.C. § 2252A(a)(2); Possession
of Child Pornography, 18 U.S.C.
§ 2252A(a)(5)(B); Forfeiture,
18 U.S.C. § 2253, 21 U.S.C. § 853,
28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Receipt of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about December 5, 2019, in the District of Maryland, the defendant,

JEFFREY DARNELL ALDERSON,

did knowingly receive child pornography and any material that contained child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2252A(a)(2)

COUNT TWO
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about May 13, 2021, in the District of Maryland, the defendant,

JEFFREY DARNELL ALDERSON ,

did knowingly possess any material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2252A(a)(5)(B)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), as a result of the defendant's conviction of the offenses alleged in Counts One and Two of this Indictment.

Child Pornography Forfeiture

2. Pursuant to 18 U.S.C. § 2253, upon conviction of the offenses set forth in Counts One and Two of this Indictment, in violation of 18 U.S.C. § 2252A, the defendant,

JEFFREY DARNELL ALDERSON ,

shall forfeit to the United States of America:

a. Any visual depiction described in 18 U.S.C. § 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense including, but not limited to an Apple iPhone 12 Max bearing serial number F2LDKE3W0D46.


Substitute Assets

3. If, as a result of any act or omission of the defendant, any of the property described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c), shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above.

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. 2461(c)



Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: February 24, 2021